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LETTER AND COMMENTS FROM VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
REGARDING DRAFT PROPOSED PLAN SITE 30 NWS YORKTOWN VA
7/28/2009
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

Sawyer, Stephanie/VBO

Subject: FW: NWSY: Site 30 Draft Proposed Plan - DEQ Comments
Attachments: Site30DraftProposedPlan(ORC&DEQ).doc

From: Smith, Wade [<mailto:Wade.Smith@deq.virginia.gov>]
Sent: Tuesday, July 28, 2009 10:58 AM
To: Kowalski, Thomas CIV NAVFAC MidLant, OPHREV4
Cc: Friedmann, William/VBO; Forshey, Adam/VBO; Thomson.Bob@epamail.epa.gov
Subject: NWSY: Site 30 Draft Proposed Plan - DEQ Comments

Tom,

I added my comments on the above-referenced report (received June 4, 2009) to Rob's comments from July 20, 2009 and attached them for your review.

Upon receipt of the requested revisions, the DEQ will issue an official letter for your files.

Please let me know if you have any questions.

Sincerely,
ernie

Wade M. Smith
Remediation Project Manager
Virginia Department of Environmental Quality
Office of Remediation Programs
Phone: (804) 698-4125
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Draft Proposed Plan

Site 30: The Bracken Road Incinerator Naval Weapons Station Yorktown Yorktown, Virginia

June 2009

Comment [S1]: Note: I monkeyed around with the graphic at the bottom to make it fit within the space.

1 Introduction

This **Proposed Plan** describes the rationale for no action required for the preferred alternative for **Environmental Restoration Program (ERP)** Site 30, the Bracken Road Incinerator, at Naval Weapons Station (WPNSTA) Yorktown, Yorktown, Virginia (the "Site"). The preferred final alternative for remedial action at the site is no further action (NFA) for soil, groundwater, sediment, and surface water. This alternative was selected following the completion of a non-time critical removal action (NTRCA) for soils and debris in 2008 as well as previous decisions investigations that indicate that the remaining media (groundwater, sediment, and surface water) do not pose an unacceptable risk

to human health and ecological receptors. Because there are no remaining unacceptable risks at the site, no further evaluation of remedial action alternatives is not necessary.

This Proposed Plan is issued jointly by the United States Navy (Navy), the lead agency for environmental restoration activities at WPNSTA Yorktown, and the United States Environmental Protection Agency (USEPA) Region 3, the lead regulatory agency, and the Commonwealth of Virginia Department of Environmental Quality (VDEQ), the support regulatory agency.

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Comment [S3]: Please protect against orphaned lines in final.

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Please Mark Your Calendar for the Public Comment Period

Public Comment Period

Month d – Month d, 2009

The Navy will accept written comments on this Proposed Plan during the public comment period. To submit comments or obtain further information, please refer to the insert page and section 7 of this document.

Attend the Public Meeting

Day, Month dd, 2009 at X:00pm

York County Public Library – Yorktown
8500 George Washington Memorial Highway
Yorktown, Virginia 236902

The Navy will hold a public meeting to explain the Proposed Plan. Verbal and written comments will be accepted at this meeting.

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Comment [WMS2]: Insert page needs updated with the correct mailing address for Mr. Kowalski.

Location of Administrative Record File:

NAVFAC Atlantic
6506 Hampton Boulevard, Norfolk, VA 23508
Phone: 757.322.4785

This Proposed Plan will be available for public review and comment at the Virgil I. Grissom Public Library (366 DeShazor Drive, Newport News,

documenting environmental investigations at Site 30 is available to the public in the **Administrative Record (AR)** file for WPNSTA Yorktown. Details

Mark Your Calendar for the Public Comment Period

Public Comment Period

Month d—Month d, 2009

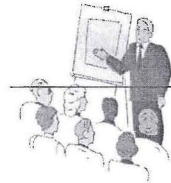
The Navy will accept written comments on this Proposed Plan during the public comment period. To submit comments or obtain further information, please refer to the insert page and section 7 of this document.

Attend the Public Meeting

Day, Month dd, 2009 at X:00pm

Place—York County Public Library—Yorktown
8500 George Washington Highway
Yorktown, Virginia 23690

The Navy will hold a public meeting to explain the Proposed Plan. Verbal and written comments will be accepted at this meeting.



Location of Administrative Record File:

NAVFAC Atlantic
6506 Hampton Boulevard, Norfolk, VA 23508
Phone: 757.322.1785

Virginia 23608, (757) 369-3190) during a 30-day public comment period that includes a public meeting and fulfills public participation responsibilities as required under Section 117(a) of the **Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA)** of 1980, as amended by the **Superfund Amendments and Reauthorization Act of 1986 (SARA)**, and Section 300.430(f)(2) of the **National Oil and Hazardous Substances Pollution Contingency Plan (NCP)**. The Navy and USEPA Region 3, in consultation with VDEQ, will make the final decision on this plan for Site 30 for all media after reviewing and considering all information submitted during the 30-day public comment period.

In addition to presenting a preferred alternative for Site 30, this Proposed plan summarizes previous Superfund investigations and actions that have been conducted at the Site. Information

regarding the dates of the public comment period, the date and time of the public meeting, and the location of the AR are included in the text box below on Page 1 of this Proposed Plan entitled "Please Mark Your Calendar." In addition, a glossary of key terms is provided at the end of this Proposed Plan; glossary terms are identified in bold print the first time they appear in this Proposed Plan.

2 Site Background

Site 30, the Bracken Road Incinerator (formerly Area of Concern [AOC] 22 and Site Screening Area [SSA] 24) encompasses an area of approximately 4 acres in the westernmost portion of Yorktown next to the York River and south of the railroad tracks (Figure 1).

Comment [S4]: I've started deleting the specific SARA amendments reference because CERCLA has since been amended by the brownfields amendments in 2002, and we can't list every amendment.

Comment [I5]: If the RR tracks are used as a directional reference, they should be referenced/labeled in Figure 1. (Alternatively, the roads could be used as a proximate reference pt for Fig. 1).

Comment [S6]: From fig 1 it appears that the NW part of the site extends off-installation. Is that right? If so, please add a sentence to the end of this paragraph explaining that and indicating the owner of the property.

Comment [S7]: The inset on the figure is illegible. Enlarge or delete it.

The incinerator was reportedly used for an unknown period of time to burn municipal waste from the housing area located in the vicinity of the incinerator. Incineration of low-grade aviation fuel also was also performed in an area just southeast of the former incinerator. Historical information found documents the burning of Venezuelan crude oil in the mid-1970s (Baker, 2005). Venezuelan crude oil has a higher specific gravity than other crude oils and contains elevated concentrations of sulfur and several

risk still posed by the activities within the ESQD, the area cannot be developed unless the mission of the Station changes substantially.

Previous Investigations and Actions

Site 30 was first identified in 1995 when it was identified by the USEPA Region 3 as an area for further study. Two depressions were noted on either side of the incinerator and a ridge line was observed to the north, north-east of the incinerator, which contained debris, including what appeared to be rocket motor fins. Site 30 was further characterized through a series of

Comment [18]: "mission of the Station"? Is this synonymous with "quality/status/contamination of the Site"? Clarify phrase.

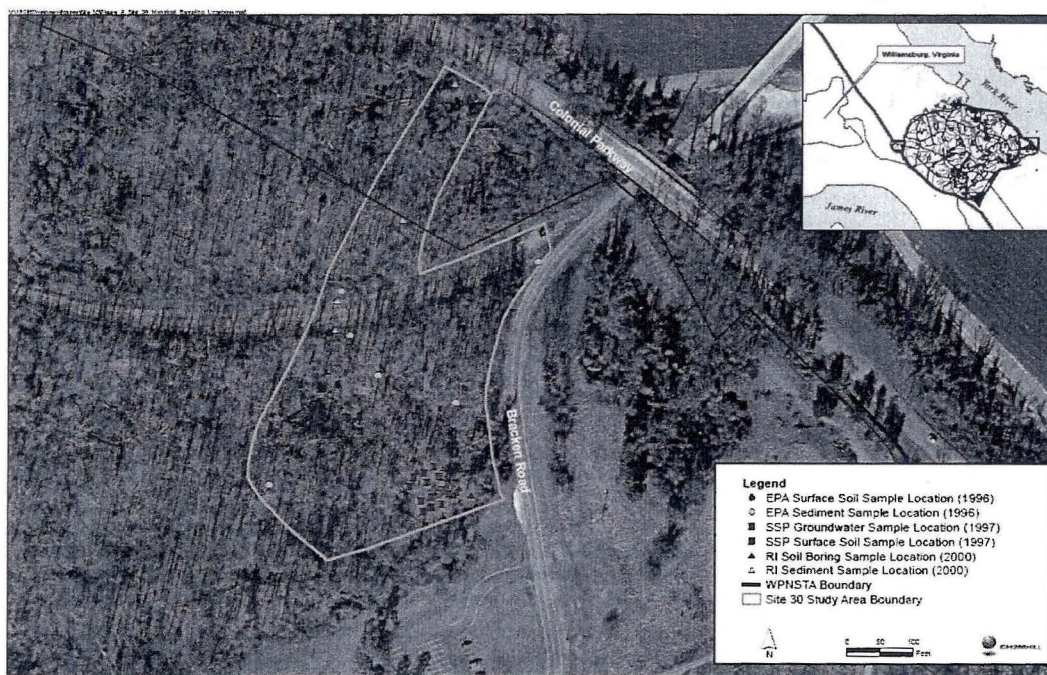


Figure 1. Site 30 Site Map

metals such as vanadium. Site 30 is located within the Explosive Safety Quantity Distance (ESQD), the area surrounding a restricted area where ordnance destruction and disposal is still ongoing. Due to unacceptable

investigations which are documented in the AR files for WPNSTA Yorktown (Table 1). These previous investigations are summarized below.

Document Title /Milestone	Author/Date	AR Document Number
AOC22, Site 12, SSA2, SSA19, and King Creek Independent Sampling and Risk Screening Report	Black & Veatch, 1996	01175

Final Site Screening Process (SSP) Report, Volumes 1 through 3	Baker, 2001	01350, 01351, 01352
Final Round One Remedial Investigation (RI) Report	Baker, 2005	2079
Engineering Evaluation/Cost Analysis (EE/CA) for Contaminated Soil	Baker, 2007	2211
Final Construction Completion Report Bracken Road Incinerator Removal Action at Site 30	Shaw, 2008	N/A
Technical Memorandum, Yorktown Site 30 Groundwater Data Review and Risk Management Consideration	CH2M HILL, 2009	N/A

Table 1 – Previous Investigations at Site 30.

AOC 22; Site 12; and SSA 2, SSA 19, and King Creek Independent Sampling and Risk Screening Report (Black and Veatch, 1996)

Soil and sediment samples were collected in 1995 from around the incinerator, mounded material, cooling water pond, and in drainage ways in order to identify any regions of heavy contamination, or “hotspots.” Iron, thallium, arsenic, lead, and vanadium were all detected in surface soil at concentrations exceeding human health and ecological risk screening levels. An additional investigation was recommended in order to determine the full extent of contamination present on-site.

Site Screening Process (SSP) Report for SSA 3, 4, 5, 9, 10, 20, 21, 22, 23, and 24 (Baker, 2001)

In 1997, surface soil, subsurface soil, and groundwater samples were collected to define the horizontal and vertical extent of organic and inorganic contamination at the site.

Elevated concentrations of inorganics in surface soil and trichloroethylene (TCE) in groundwater were detected. Due to the elevated vanadium and iron concentrations in the area around the drainage way, a removal action for surface soil was recommended. In addition, due to the potential unacceptable risks to human health and ecological receptors that were identified in the SSP-risk screening, a Remedial Investigation (RI)/Feasibility Study (FS) for Site 30 was recommended.

Round 1 RI Report, Sites 27 through 30 (Baker, 2005)

Additional soil and sediment samples were collected in 2000 to close remaining data gaps and aid in the completion of the Human Health Risk Assessment (HHRA) and Ecological Risk

Assessment (ERA). Potential unacceptable human health risks were identified from exposure to vanadium in soils while potential unacceptable ecological risks to terrestrial communities were identified from exposure to chromium, iron, lead, mercury, nickel, thallium, vanadium, and zinc in soils. There were no unacceptable risks to human health or ecological receptors identified from exposure to sediment. Based on these results, it was recommended that further action be taken to address the risks present at Site 30.

Engineering Evaluation/Cost Analysis (EE/CA) for Contaminated Soil, Site 30, Bracken Road Incinerator and Environs (Baker, 2007)

In 2007, an Engineering Evaluation/Cost Analysis (EE/CA) was completed to develop and evaluate remedial action alternatives for the inorganic constituents posing potential unacceptable human health and ecological risks in soils. Groundwater was not addressed as part of this EE/CA. The following alternatives were evaluated:

- Alternative 1 – No Action
- Alternative 2 – Removal with Off-Site Disposal
- Alternative 3 – In-Situ Stabilization

Although both Alternatives 2 and 3 were determined to be equally protective of human health and the environment in the short-term, Alternative 2 provided a long-term solution that was easier to implement and, thus, was selected as the preferred alternative.

Non-Time Critical Removal Action (NTCRA), 2008

From March to July 2008, soil and debris were excavated and the old incinerator was removed.

Comment [S9]: Regarding Table 1—do not introduce acronyms in the titles to documents. (the acronyms aren’t actually in the titles on the page of the document, are they?)

Comment [S10]: Title of this document differs from that listed in Table 1. Please reconcile.

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Comment [WMS11]: Unbold or add to Glossary of Terms.

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Excavation of soil and debris as well as the demolition and removal of the old incinerator was conducted from March to July 2008. Soils were ~~as~~ removed to a depth of approximately 4 feet. In total, 2,265 cubic yards (3,398 tons) of contaminated soil, debris, and the concrete incinerator foundation was disposed-excavated from Site 30 during removal activities and disposed off-site. Samples of the remaining soils verified that the concentrations of contaminants of concern (COCs) were below the **Preliminary Remediation Goals (PRGs)** and that the remaining soils did not pose an unacceptable risk to human or ecological receptors. ~~In total, 2,265 cubic yards (3,398 tons) of contaminated soil, debris, and the concrete incinerator foundation was disposed from Site 30 during removal activities.~~

Construction Completion Report (CCR) (Shaw, 2008)

The Construction Completion Report (CCR) ~~(CCR)~~ documents all field activities that occurred during the 2008 NTCRA including soil and debris excavation, confirmation sampling, and siteSite restoration, and ~~documents~~ concludes that no further remedial action is required for soils at Site 30.

Groundwater Tech Memo (CH2M HILL, 2009)

One ~~direct-push technology (DPT)~~ groundwater sample was collected in 2008 to confirm the presence or absence of organic compounds (including TCE) previously detected at low, estimated levels in monitoring well A24GW02 during the 2001 SSP investigation. ~~The g~~Groundwater sample, YS30-DW01, was collected immediately adjacent to monitoring well A24GW02 as this because the well was dry. No volatile organic compounds (VOCs) were detected in the groundwater sample. ~~There were no detections of volatile organic compounds in the groundwater sample and.~~ Based on these results, the Navy, USEPA Region 3, and the VDEQ agreed that the organic concentrations detected in monitoring well A24GW02 during the 2001 SSP were not representative of groundwater conditions, ~~that no VOCs had not been released into the groundwater had occurred, and, consequently,~~ that no further investigation or remedial action was required for groundwater at Site 30.

3 Site Characteristics

The ~~siteSite~~ is situated within a forested area and slopes downward toward the north and a railroad spur. The ~~siteSite~~ receives surface water run-off from surrounding wooded areas and drains into a culvert that runs beneath the railroad tracks, across the WPNSTA fence line, through the small forested wetland between WPNSTA property and Colonial National Parkway, and eventually drains into the York River toward the northeast.

Groundwater at the ~~siteSite~~ is encountered from approximately 8 to 20 feet below ground surface in the unconfined Yorktown-Eastover aquifer. Based on ~~siteSite~~ topography and available groundwater elevations, groundwater flows radially outward from the area of highest elevation towards the north and ~~will eventually~~ discharges into the York River. There ~~is~~ are no current or expected future uses for groundwater at the ~~siteSite~~. Potable water at WPNSTA Yorktown is supplied by the City of Newport News Waterworks.

4 Scope and Role of Response Action

WPNSTA Yorktown was placed on the National Priorities List (NPL) in October 1992. Site 30 is one of several CERCLA sites being addressed at WPNSTA Yorktown. A summary of investigations at all CERCLA sites is provided in the Site Management Plan for WPNSTA Yorktown, which is available in the AR file. Based on the Round 1 RI (Baker, 2005), there are no unacceptable risks to human health or the environment from exposure to sediment or surface water. Following the NTCRA in 2008, no further risk is left from surface and subsurface soils (Shaw, 2008) and, based on the 2009 Groundwater Tech Memo (CH2M HILL, 2009), no unacceptable risks are present from exposure to groundwater. As such, no further action (NEA) is warranted for all media at Site 30. NEA is intended to be the final decision for the Site and does not include or affect any other sites at Yorktown.

Comment [S13]: Make sure that all headings have at least two lines of text after them in the final PRAP. (Protect against bad breaks as here.)

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Comment [S14]: Please add more substance about the NPL site as a whole. See EPA's ROD guidance, section 3.3.4. This section is about the NPL site as a whole, not just the site at issue here.

Comment [WMS15]: Unbold or add to Glossary of Terms.

Comment [S16]: How many?

Comment [WMS17]: Unbold or add to Glossary of Terms.

Comment [S12]: Please add text explaining why TCE was detected in the direct-push sample from 2001, even if conjecture. Lab contamination of sample? TCE was in the soil that was removed in the NTCRA, not the gw?

5 Summary of Site Risks

An assessment of potential human health and ecological risks were evaluated and documented in the Round 1 RI (Baker, 2005) and the 2009 Groundwater Tech Memo (CH2M HILL, 2009). Based on the Round 1 RI (Baker, 2005), there are no unacceptable risks to human health or the environmentecological receptors from exposure to sediment or surface water. Following the NTCRA in 2008, no further risk is left from surface and subsurface soils (Shaw, 2008) and, based on the 2009 Groundwater Tech Memo (CH2M HILL, 2009), no unacceptable risks are present from exposure to groundwater. As such, no further action is warranted for all media at Site 30 and is intended to be the final decision for the Site.

Potential risks from exposure to siteSite media are summarized below. Additional information regarding human health and ecological risks as well as how they such risks are calculated is included in text boxes within these this sections.

5.1 Soils

The Ecological Risk Assessment (ERA) identified potential unacceptable ecological risks for lower trophic-level receptors (plant and invertebrate communities) from exposure to select inorganics (chromium, iron, lead, mercury, nickel, thallium, vanadium, and zinc) (Baker, 2005). However, the Navy, USEPA Region 3, and VDEQ agreed that with the 2008 NTCRA reduced contamination levels in soil to below their respective PRGs, as documented in the Construction Completion Report (CCR) (Shaw, 2009). the 2008 removal of contaminated soils to below their PRGs, and documented in the CCR (Shaw, 2009). Consequently, that the Navy, USEPA Region 3, and VDEQ agree that no unacceptable ecological risks that remain from exposure to siteSite soils and no further action is warranted.

The Human Health Risk Assessment (HHRA) identified potential unacceptable non-cancer hazards for current trespassers (adult and child), current and future industrial/commercial workers, and future adult and child residents and construction workers from ingestion and dermally contact withef

vanadium in soils. However, the Navy, USEPA Region 3, and VDEQ agreed with that the 2008 removal of contaminated soils lowered contamination levels below their PRGs, as documented in the Construction Completion Report (CCR) (Shaw, 2009). As a result, to below their PRGs, and documented in the CCR (Shaw, 2009), that all no unacceptable human health risks from exposure to siteSite soils were eliminated by the 2008 NTCRA and no further action is warranted for protection of human health.

5.2 Groundwater

The ERA concluded that additional ecological risk evaluations for groundwater were not necessary since there is no direct ecological exposure to groundwater.

—The HHRA identified potential unacceptable non-cancer hazards based on a future drinking water exposure scenario (Baker, 2005). The identified non-cancer hazard was based on the ingestion of TCE by future child residents. However, the groundwater technical memorandum (CH2M HILL, 2009) verified that no release to groundwater had occurred and, therefore, no unacceptable human health risks were identified.

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Comment [I18]: In Section 5 (and its subsections), no numerical data is given to support determination (i.e. HI = ..., which is less risk than the acceptable threshold level (HI<1) and cancer risk). Some data per medium analyzed helpful for community's determination if sufficient testing done and NFA preferred alternative.

Comment [S19]: Justification as to why the 2009 report made that conclusion is necessary, either here or at the end of Section 2 (at comment S10) is necessary.

What is Human Health Risk and How is it Calculated?

A Human Health Risk Assessment (HHRA) estimates the likelihood of health problems occurring if no cleanup action were taken, and consists of the following four-step process:

Step 1: Analyze Contamination

Step 2: Estimate Exposure

Step 3: Assess Potential Health Dangers

Step 4: Characterize Site Risk

In Step 1, comparisons of the concentrations of site chemicals to scientific studies on the effects those chemicals have on people help determine which chemicals pose the greatest threat to human health.

In Step 2, the Navy considers different ways people might be exposed to chemicals, the concentrations, how often, and how long they may be exposed to determine a "reasonable maximum exposure" (RME) scenario that portrays the highest level of human exposure that could reasonably be expected to occur.

In Step 3, the Navy uses the information from Step 2 combined with toxicity information to assess potential health risks. The Navy considers two types of risk: (1) cancer risk, and (2) non-cancer hazard. The likelihood of any kind of cancer resulting from a contaminated site is generally expressed as a probability; "1 in 10,000 chance" (for every 10,000 people that could be exposed, one extra cancer may occur as a result of exposure). For non-cancer health effects, the Navy calculates a "hazard index" (HI), that is the ratio between the "reference dose," (the dosage at which no adverse health effects are expected), and the RME (the estimated maximum exposure level). A "threshold level" (HI less than 1) exists below which non-cancer health effects are no longer predicted.

In Step 4, the Navy determines whether site risks are high enough to cause health problems for people at or near the site. The results of the three previous steps are combined, evaluated, and summarized. The Navy adds up the potential risks from the individual contaminants and exposure pathways and calculates a total site risk.

5.3 Sediment

The ERA concluded that no unacceptable risks exist for lower trophic level aquatic receptors, such as earthworms, at Site 30 or in the wetlands downgradient of Site 30 based on exposures to sediment, and recommended no further evaluation. In addition, no unacceptable risks were identified, and no further evaluation was recommended, for upper trophic-level terrestrial and aquatic receptors, such as fish or birds using Site 30 or the wetlands downgradient of Site 30.

The HHRA evaluated potential risks for current on-site ~~Site~~ workers and trespassers and future on-site workers and residents from exposure to sediments (Baker, 2005). No unacceptable human health risks were identified.

5.4 Surface Water

The risk associated with surface water could not be directly evaluated at Site 30 due to the absence of continuous standing water on-site ~~Site~~. As a result, groundwater data was evaluated as a surrogate for surface water by examining the potential migration of contaminants to downgradient habitats (Baker, 2005). The ERA concluded that no unacceptable ecological risk for upper and lower level aquatic receptors based on exposures to surface water.

The HHRA did not evaluate risk posed by surface water due to the ephemeral nature of surface water present on-site ~~Site~~ (Baker, 2005).

Comment [I20]: Section 1 indicates that bolded text was to indicate terms in glossary. The bolded terms in this box aren't in the back: either unbold or put in glossary.

Comment [WMS21]: Unbold or add to Glossary of Terms.

Comment [WMS22]: Unbold or add to Glossary of Terms.

Comment [WMS23]: Unbold or add to Glossary of Terms.

Comment [WMS24]: Unbold or add to Glossary of Terms.

Comment [S25]: The text box for ERA process looks terrible. Maybe move it entirely to the next page?

WHAT IS ECOLOGICAL RISK AND HOW IS IT CALCULATED?

An Ecological Risk Assessment (ERA) evaluates the potential risks to plants, animals, habitats, and communities, and is conducted using a step-wise process (as outlined in Navy and USEPA ERA policy and/or guidance), that includes decision points where agreement among stakeholders is reached to determine if the process should continue or terminate. The process continues until a final decision has been reached (i.e., remedial action if unacceptable risks are identified, or no further action if risks are acceptable). The process can also be iterative if data needs are identified at any step; the needed data are collected and the process starts again at the point appropriate to the type of data collected. An ERA has three principal components:

1. Problem Formulation establishes the goals, scope, and focus of the ERA and includes:

- Compiling and reviewing existing information on the habitats, plants, and animals that are present on or near the site.
- Identifying and evaluating area(s) where site-related chemicals may be found (source areas) and at what concentrations.
- Evaluating potential movement (transport) of chemicals in the environment.
- Identifying possible exposure media (soil, air, water, sediment).
- Evaluating if/how the plants and animals may be exposed (exposure pathways).
- Evaluating routes of exposure (for example, ingestion).
- Identifying specific receptors (plants and animals) that could be exposed.
- Specifying how the risk will be measured (assessment and measurement endpoints) for all complete exposure pathways.

2. Risk Analysis which includes:

- Exposure Estimate - An estimate of exposures concentrations. This includes direct exposures to lower trophic level receptors (organisms low on the food chain such as plants and insects) and upper trophic level receptors (organisms higher on the food chain such as birds and mammals), and indirect exposures (exposures via the food chain) for upper trophic level receptors.
- Effects Assessment - The concentrations of chemicals at which an adverse effect may occur are determined.

3. Risk Calculation or Characterization:

- The first two steps are used to estimate potential risk to plants and/or animals by comparing the exposure estimates with the effects thresholds.
- Also included is an evaluation of the uncertainties (potential degree of error) that are associated with the predicted risk estimate and their effects on ERA conclusions.

The three principal components of an ERA are implemented as an 8-step, 3-tiered process as follows:

1. **Screening-Level ERA (Steps 1-2; Tier 1)** – The Screening-Level ERA (SLERA) conducts an assessment of ecological risk using the three steps described above and very conservative assumptions (such as using maximum chemical concentrations).
2. **Baseline ERA (Steps 3-7; Tier 2)** – If potential risks are identified in the SLERA, a Baseline ERA (BERA) is typically conducted. The BERA is a reiteration of the three steps described above but uses more site-specific and realistic exposure assumptions, as well as additional methods not included in the SLERA, such as consideration of **background** concentrations. The BERA may also include the collection of site-specific data (such as measuring the concentrations of chemicals in the tissues of organisms, such as fish) to address key risk issues identified in the SLERA.
3. **Risk Management (Step 8; Tier 3)** – Step 8 develops recommendations on ways to address any unacceptable ecological risks that are identified in the BERA and may also include other

activities such as evaluating remedial alternatives.

6 Preferred Alternative

Because the 2008 ~~Removal Action~~ NTCRA, completed at Site 30 eliminated all unacceptable risk to human health and the environment from soil, and because no unacceptable risks were identified in the remaining media, the preferred final alternative for all media at Site 30 is no further action (NFA). NFA is warranted based on a review of all information that demonstrates ~~because~~ there are no unacceptable risks to human health and the environment ~~to from~~ soil, groundwater, sediment or surface water at Site 30. Because there are no unacceptable risks, evaluation of remedial action alternatives is not necessary.

Comment [I28]: I don't know if there needs to be a section explaining the ~~rule~~ evaluation criteria used to assess a remedy if the remedy is NFA. If so, it should probably go before this next "preferred alternative" section

Comment [WMS26]: Unbold or add to Glossary of Terms.

Comment [I27]: See previous comment about bold terms. Alternatively, can unbold and give example "...background concentrations (i.e. ...)"

Under the No Further Action alternative, no response action will be performed at Site 30 and no restrictions on land use or exposure are ~~would be implemented~~ necessary. The Navy and USEPA may reconsider No Further Action for Site 30, or consider evaluation and select another ~~of other alternatives~~ if public comments or additional data indicate that site conditions warrant consideration of ~~another alternatives~~ warrants consideration.

6.1 Commonwealth Acceptance

~~The~~ The VDEQ supports the ~~NFA~~ no further action alternative; ~~however, the~~ The VDEQ's final concurrence with the ~~NFA~~ the selected alternative will be provided following the review of all comments received during the public comment period.

6.2 Community Acceptance

Community acceptance will be evaluated after the public comment period and will be fully evaluated in the **Record of Decision (ROD)** that will follow this Proposed Plan.

7 Community Participation

The Navy and USEPA Region 3, in consultation with VDEQ, will make the final decision on this approach for Site 30 after reviewing and considering all information and comments submitted during the 30-day public comment period. The public comment period for this Proposed Plan will extend from day/month to day/month, and a public meeting to discuss the Proposed Plan will be held day/month/time at XXXXX. Details regarding the public comment period and public meeting are included in the text box in Section 1 entitled "Please Mark Your Calendar." The Navy will summarize and respond to all comments submitted during the public comment period in a responsiveness summary that will be included in the final decision document, the Record of Decision (ROD), that will follow this Proposed Plan. This Proposed Plan and the ROD will become part of the AR file for WPNSTA Yorktown.

Public participation is encouraged since the preferred alternative ~~put forward~~ here ~~presented~~ suggested in this Proposed Plan may be modified or another alternative selected based on new information and/or public comments

received. The public is encouraged to gain a more comprehensive understanding of Site 30 and the Navy's Environmental Restoration Program by attending this and other public meetings advertised in the *Daily Press* and *Virginia Gazette* newspapers and accessing information included in the AR file. Minutes of all public meetings will be included in the file.

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Comment [S29]: I recommend that you include an end time for the meeting so you'll know when you can leave if no one attends.

During the comment period, interested parties may submit written comments to the following address:

| **Mr. Tom Kowalski, P.G.**
NAVFAC MIDLANT, Code EV3
9742 Maryland Avenue
Building N-26, Room 3208
Norfolk, VA 23511-3095
Phone: (757) 455-6618
Email: Tom.kowalski@navy.mil

For further information, please contact:

Mr. Rob Thomson, P.E., R.E.M.
| USEPA (Region III)
1650 Arch Street
Philadelphia, PA 19103
Phone: (215) 814-3357
Fax: (215) 814-3025
Email: Thomson.Bob@epamail.epa.gov

Mr. Wade Smith
Virginia Dept. of Environmental Quality
629 East Main Street, 4th Floor
Richmond, VA 23219
Phone: (804) 698-4125
Fax: (804) 698-4234
| Email: ~~wmsmith~~wade.smith@deq.virginia.gov

Glossary

Administrative Record (AR): Site information is compiled in an Administrative Record and placed in the general ERP information repository for public review.

Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA): A Federal law, commonly referred to as the "Superfund" Program, passed in 1980 and amended by the Superfund Amendments and Reauthorization Act of 1986. CERCLA provides for cleanup and emergency response in connection with existing inactive hazardous waste disposal sites that endanger public health and safety or the environment.

Direct Push Technology (DPT) - A category of equipment that push or drive steel rods into the ground. They allow cost-effective, rapid sampling and data collection from unconsolidated soils and sediments. DPT may be used to collect soil, soil gas, or groundwater samples

Ecological: Refers to plants and animals in the environment.

Ecological Risk Assessment (ERA): An evaluation of the risk posed to the environment if remedial activities are not performed at the site.

Environmental Restoration Program (ERP): The Navy, as the lead agency, acts in partnership with USEPA Region 3 and VDEQ to address environmental investigations at the facility through the ERP. The current ERP is consistent with CERCLA and applicable state environmental laws.

Groundwater: Subsurface water that occurs in soils and geologic formations that are fully saturated.

Human Health Risk Assessment (HHRA): An evaluation of the risk posed to human health should remedial activities not be implemented.

Inorganics: Refers to a variety of metals found in soils, sediments, surface water, and groundwater that may or may not be Site-related.

Media: Soil, groundwater, surface water, or sediment at the Site.

National Oil and Hazardous Substances Pollution Contingency Plan (NCP): Provides the organizational structure and procedures needed to prepare for and respond to discharges of oil and releases of hazardous substances, pollutants, and contaminants.

Non-Time-Critical Removal Action (NTCRA): An action taken to abate, prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of a contaminant at a Superfund site for which a planning period of at least six months is available before on-site activities must begin and the need is less immediate.

Preliminary Remediation Goals (PRGs): Establishes the metric criteria to be achieved during a remedial action. A PRG represents the contaminant levels that may remain upon completion of a remedial (removal) action and still be protective of human health and the environment. PRGs are determined as the greater value of either the remediation goal or background concentration for each contaminant.

Proposed Plan: A document that presents and requests public input regarding a proposed cleanup alternative.

Public Comment Period: The time allowed for the members of an affected community to express views and concerns regarding an action proposed to be taken by the Navy and USEPA, such as a rulemaking, permit, or Superfund-remedy selection.

Remedial Investigation (RI): A study that supports the selection of a remedy where hazardous substances have been disposed or released. The RI identifies the nature and extent of contamination at the facility.

Receptors: Humans, animals, or plants that may be exposed to risks from contaminants related to a given site.

Record of Decision (ROD): A legal document that describes the cleanup action or remedy selected for a site, the basis for choosing that remedy, and public comment on the considered selected remedy.

Sediment: Particulate matter that can be transported by fluid flow and which is found submerged underwater.

Site: The area of the facility where a hazardous substance, hazardous waste, hazardous constituent, pollutant, or contaminant from the facility has been deposited, stored, disposed of, placed; has migrated; or otherwise come to be located.

Site Screening Process (SSP): ~~Process to determine if an area should be considered a Site for further investigation.~~

Soil: A mixture of organic and inorganic solids, air, water, and biota which exists on the earth surface above bedrock, including materials of anthropogenic sources, such as slag, sludge, etc.

Surface Water: All water naturally open to the atmosphere (rivers, lakes, reservoirs, ponds, streams, impoundments, seas, estuaries, etc.)

United States Environmental Protection Agency (USEPA): The Federal agency responsible for administration and enforcement of CERCLA (and other environmental statutes and regulations), and with final approval authority for the Selected Remedy.

Virginia Department of Environmental Quality (VDEQ): The Commonwealth agency responsible for administration and enforcement of environmental regulations.

